

CALIFORNIA WATERFOWL ASSOCIATION
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TO:

Contact Name:

TOM HOWARD

Association:

SWRCB

FAX Number:

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FROM:

Name

BILL GAINES

Message/Special Instructions

<p>Comments on The SWRCB Draft Water Quality Control Plan</p>



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"Preserving California's waterfowl, wetlands, and outdoor heritage... since 1945."

March 10, 1995

Mr. John Caffrey, Chairman
State Water Resources Control Board
P. O. Box 100
Sacramento, CA 95812-0100

Subject: Draft Water Quality Control Plan

Dear Mr. Caffrey:

The California Waterfowl Association has reviewed the State Water Resources Control Board (SWRCB) Draft Water Quality Control Plan with interest, and is seriously concerned about the potential impact the proposed plan may have on the ability to deliver water supplies to wetlands south of the Delta.

Roughly 100,000 acres of state and federal refuges and other wildlife management areas are located in the San Joaquin Valley, primarily on the west side in the Grasslands basin. Due to the poor quality of both the agricultural drainage and groundwater, these wetland areas are almost totally dependent upon surface water supplies. Although PL 102-575 requires the Secretary of the Interior to deliver the base supply of 250,000 acre feet of water necessary to properly manage these areas, a large portion of this water must be exported south from the Delta.

The export limits called out in the draft plan significantly reduce the period during which the State Water Project and the Central Valley Project can make major diversions from the Delta. These restrictions will force the projects to rely on the fall and winter months to move most of the water south. These are the same months during which the water supplies for the refuges and the wildlife management areas must be delivered. As a result, there is a major question as to whether or not sufficient pumping and conveyance capacity exists in the DMC and the California Aqueduct to deliver the water available in a given year during such a narrow time frame. It is extremely important that the final Water Quality Control Plan address this issue, and, if necessary, include language which will safeguard these critical wetland water supplies.

In addition, our Association supports the joint recommended changes to the Suisun Marsh objectives provided by the Suisun Resource Conservation District (SRCD), the U.S. Bureau of Reclamation, the California Department of Fish and Game, and the California Department of Water Resources, in their comments to the Board, dated March 7, 1995. However, we do share the concern expressed by the SRCD in their letter to the Board, dated March 6, 1995, in regards to the effective dates for compliance of S-35 and S-97. We concur with the position of the SRCD that there should be a precise timeframe for these stations to come into compliance, and any extension of this time should have a provision for mitigation if water quality standards are not met.

Our Association appreciates the opportunity of providing these comments and urges the Board to incorporate them into the final document.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Gaines", written in a cursive style.

Bill Gaines, Director
Government Affairs